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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$12,700.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:21-MC-00157-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
18 Charles Robert Giglio (“claimant”), by and through their respective counsel, as follows:

19 1. On or about March 23, 2021, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$12,700.00 in U.S. Currency (hereafter “defendant currency”), which was seized on January 12, 2021.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
25 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
28 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was June 21, 2021.

3 4. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August
4 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed August 19, 2021, the parties stipulated to extend to October
8 19, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed October 19, 2021, the parties stipulated to extend to
12 November 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

15 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
16 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
18 subject to forfeiture.

19 8. Accordingly, the parties agree that the deadline by which the United States shall be
20 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
21 alleging that the defendant currency is subject to forfeiture shall be extended to December 17, 2021.

22 Dated: 11/18/21

PHILLIP A. TALBERT
Acting United States Attorney

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24 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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1 Dated: 11/18/21

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Charles Robert Giglio
(Signature authorized by email)

6 **IT IS SO ORDERED.**

7 Dated: November 18, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE